



United Parcel Service 911 Grade Lane, Bldg. 2, Louisville, KY 40213  
(502) 359-7304

73440

FAA-99-6717-36

August 30, 1999

OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET  
1999 AUG 32 A 10:18

Federal Aviation Administration  
Office of Chief Counsel, Rules Docket Office  
800 Independence Ave., SW Room 915-G  
Washington, DC 20591

Re: Docket Number 29547

Dear Sir or Madam:

The purpose of this letter is to comment on docket number 29547 (207-minute ETOPS). United Parcel Service Airlines (UPS) operates B-767 aircraft utilizing 180-minute ETOPS rules in the Central East Pacific, the North Pacific and the North Atlantic regions. In 1995, UPS was the first 121 airline to be granted 180-minute ETOPS 'out of the box' and the first U.S. airline to operate regularly scheduled ETOPS flights in the North Pacific. Because of our ETOPS experience and the potential impact of this rule to our operations, please consider our comments.

The policy change proposed by the Airline Transport Association (ATA) recommends a 15 percent extension to the 180-minute rule for flights, when necessary, due to airport closures or weather related conditions that would prevent 180-minute operations. The 15 percent extension would provide 207-minute operations. UPS is very much in favor of the 207-minute rule as it could greatly enhance operations in the North Pacific. Because the new rules would only apply to existing 180-minute routes on a flight-by-flight exception basis, we feel that the rule proposal would actually enhance safety by providing additional suitable airports. Although UPS agrees with the basic concept of the proposal, we disagree with the proposed rule change in regards to some of the specific equipment requirements and Rescue and Fire Fighting Services (RFFS) levels.

The original ETOPS document, AC 120-42A, specifies system requirements and limitations; however, it does not outline specific types of technology or specific equipment that is needed to satisfy the ETOPS requirements. It is a general document that allowed different engine and airframe manufacturers to provide unique solutions to their engines and aircraft to comply with the ETOPS requirements. In contrast, the 207-minute proposal does make specific equipment requirements. The proposal requires certain types of technology (SATCOM) and certain equipment requirements (fuel boost pump alternate power source), for example, for which there is no substantiated need. Requirements for 207-minute ETOPS should undergo a similar analysis to that required for 180-minute ETOPS and, if appropriate, made to be more demanding than 180-minute ETOPS. However, the 207-minute ETOPS requirements should be made more demanding only if analytical studies indicate the need. Because the 207-minute proposal only adds a 27 minute extension to the Area of Operation that will only be necessary

when the normal **180-minute ETOPS** airports do not meet dispatch requirements, UPS believes that some of the proposed requirements are not justified. United Parcel Service, therefore, objects to the following requirements outlined in the **207-minute** proposal:

1. **SATCOM**: "Operators shall use **SATCOM** voice and/or **SATCOM datalink** as a minimum in order to meet FAR requirements for rapid and reliable communications."

This requirement eliminates the use of High Frequency (HF) systems. High frequency is approved for **180 minute ETOPS** and three or four engine operations for any distance and satisfies the rapid and reliable communications criteria. To exclude HF systems entirely, especially in light of recent advances in HF datalink, is not supported. To improve reliability over traditional approved HF voice may be desirable; however, HF datalink most definitely accomplishes that.

2. **SATCOM datalink for company communications prior to ETOPS area entry**: "Operators shall, prior to the extended range entry point, use **datalink** to update any revised flight plan (company communications) if required as a result of reevaluation of aircraft system capabilities and **enroute** alternates. Dispatch will review **enroute** alternates and advise the flight crew of all suitable alternates within **207** minutes of the planned routing."

This requirement again eliminates the use of HF systems, either voice or datalink. There is no justification to support this position. Present **ETOPS** operations may utilize HF voice to satisfy this communication requirement. There are no reliability comparisons between **SATCOM datalink** and HF datalink to support the exclusion of HF datalink.

3. **Fuel boost pump alternate power source**: "At least one fuel boost pump in each main fuel tank must be able to be powered by a backup electrical power source other than the primary engine driven or **APU** driven generator."

There is no study that eliminates suction feed as a satisfactory method to providing fuel in **ETOPS** operations. The **B-777** has a backup source because it was not known if the new generation engines on those airplanes would provide satisfactory suction feed. It was determined during testing that the **B-777** did have satisfactory suction feed but the alternate power source had already been designed into the system. As a contrast, the engines on the **B-767** have proven to have excellent suction feed characteristics. To require this airplane to have an alternate power source is not supported by the history or the performance of the airplane.

4. **Requirement for Rescue and Fire Fighting Systems (RFFS)**: "Operators shall ensure that adequate levels of **RFFS** for **enroute** alternates are available. For the case of **207-minute ETOPS**, the aircraft must remain at all times within **207** minutes of at least one adequate airport (as defined in AC **120-42A**, Appendix 3) which has a **RFFS** of **ICAO Category 7** or higher. If such equipment is not available on the airport, an equivalent level of support must be reasonably accessible given notification of the divert."

August 30, 1999

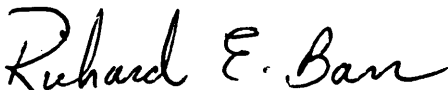
Page 3

This requirement should not be any more restrictive than the requirements for use by three or four engine aircraft. Additionally, there should be a differential in requirements for cargo aircraft. The equipment required to protect the number of occupants on cargo aircraft is at a much lower level than that required to protect an aircraft with hundreds of occupants.

The final **207-minute** rule must have requirements based on factual studies that support the requirements. In the proposal's present form only one aircraft type meets the requirements and makes approval for other aircraft types cost prohibitive. Ironically, the aircraft types that will have difficulty qualifying for the proposal have accumulated the historical data that supports and allows consideration of a **207-minute ETOPS** rule. The requirements of the final proposal should reflect a reasonable, factually based set of rules.

In conclusion, the proposal for **207-minute ETOPS** will provide a much-needed extension to **180-minute ETOPS**. United Parcel Service strongly supports the proposal except for the aforementioned items.

Sincerely,

A handwritten signature in black ink that reads "Richard E. Barr". The signature is written in a cursive, flowing style.

Richard E. Barr

Vice President Flight Operations